

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

12-7609 (JLL)

RONALD MORRISON,

Plaintiff,

v.

LVNV FUNDING, LLC,

Defendant.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441(b), and 1446, Defendant LVNV Funding, LLC ("LVNV"), by its attorney, hereby removes this action from the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County, to the United States District Court for the District of New Jersey. In support of this Notice of Removal, LVNV states as follows:

1. Plaintiff Ronald Morrison originally commenced this action by filing a Complaint against Defendant LVNV Funding, Inc. in the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County, where it is presently captioned as *Ronald Morrison v. LVNV Funding, LLC*, Docket No.: DC-024369-12. No further proceedings before the State court have occurred.

2. In the Complaint, plaintiff alleges statutory causes of action against LVNV. A true and correct copy of Plaintiff's Complaint is attached hereto as Ex. "A."

3. Plaintiff accuses LVNV of violating the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

4. LVNV received Plaintiff's Summons and Complaint on or about November 16, 2012.

5. This Court has federal question jurisdiction over Plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441(b) in that the claims are "founded on a claim or right arising under the . . . laws of the United States . . ."

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which LVNV received Plaintiff's Complaint. See 28 U.S.C. § 1446.

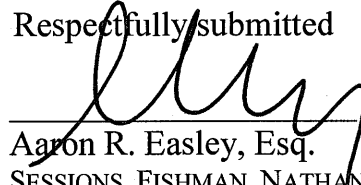
7. Written notice of this Notice of Removal of this action is being immediately provided to the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County. *See* Ex. "B."

8. Written notice of this Notice of Removal of this action is being caused to be served on Plaintiff.

WHEREFORE, Defendant LVNV Funding, LLC gives notice that this action is removed from the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County, to the United States District Court for the District of New Jersey.

Dated: December 11, 2012

Respectfully submitted



Aaron R. Easley, Esq.

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.

200 Route 31 North, Suite 203

Flemington, NJ 08822

Phone: (908) 751-5940

Fax: (908) 751-5944

aeasley@sessions-law.biz

Attorney for Defendant


LVNV Funding, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December 2012, a copy of the foregoing **Notice of Removal to the United States District Court for the District of New Jersey** was served by Federal Express upon the Clerk of the Court and via regular mail upon Plaintiff Pro Sè at the below address:

Ronald Morrison
8 Monticello Avenue, Apt. #32
Newark, NJ 07106-1524
Tel. No. : 201-281-1461
Plaintiff Pro Sè

By:



Aaron R. Easley, Esq.
Attorney for Defendant
LVNV Funding, LLC

EXHIBIT “A”

SPECIAL CIVIL PART SUMMONS AND RETURN OF SERVICE – FORM B

Plaintiff or Plaintiff's Attorney Information:

Name:

Ronald Morrison

Address:

8 Monticello Ave #32
Newark NJ 07106Telephone No.: 201-281-1461Ronald Morrison

, Plaintiff(s)

versus

LUNV Funding

, Defendant(s)

Demand Amount:	\$	<u>15,000</u>
Filing Fee:	\$	<u>50.00</u>
Service Fee:	\$	<u>7.00</u>
Attorney's Fees:	\$	<u> </u>
TOTAL	\$	<u>15,057.00</u>
		<u>\$0.00</u>

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, SPECIAL CIVIL PARTEssex COUNTY
Newark NJ 07102

DC-024369-12

Docket No: _____
(to be provided by the court)

Civil Action

SUMMONS

(Check one): ☐ Contract or ☒ Tort

Defendant(s) Information: Name, Address & Phone:

LUNV FundingP.O. Box 10497Greenville SC, 29603888-665-0374

RETURN OF SERVICE (For Court Use Only)

Date Served:

Date Served: 11/05/2012

RETURN OF SERVICE IF SERVED BY COURT OFFICER

RETURN OF SERVICE IF SERVED BY COURT OFFICER (For Court Use Only)

Docket Number: _____

Date: _____ Time: _____ WM _____ WF _____ BM _____ BF _____ OTHER _____

HT _____ WT _____ AGE _____ HAIR _____ MUSTACHE _____ BEARD _____ GLASSES _____

NAME: _____ RELATIONSHIP: _____

Description of Premises: _____

I hereby certify the above to be true and accurate:

Special Civil Part Officer

FILED

OCT 22 2012

NEW JERSEY JUDICIARY

Ronald Morrison
Plaintiff

Michael E. Hubner

FILING FEE WAIVER REQUEST

Based on Inability to Pay

VS.

LNUV Funding
Defendant

This waiver is only applicable to the courts filing fees for this case. It does not cover fees to outside agencies, I.E., Court Officers, The Post Office, Transcripts & The Star Ledger.

Applicant's Name:			Docket Number:
Last: <u>Morrison</u>	First: <u>Ronald</u>	MI: <u>A</u>	
Home Address:			Home Phone #:
Street: <u>8 Monticello Ave</u> Apt No.: <u>32</u>			(201) <u>281-1461</u>
City: <u>Newark</u> State: <u>NS</u> Zip: <u>07106</u>			Number of Dependents
			<u>1</u>

I, Ronald Morrison, am over the age of 18 and request no court fee be charged as I am without funds to pay the fee. I am a (check one) ☐ Plaintiff ☐ Defendant in the following court:

☐ Civil ☒ Special Civil Part ☐ General Equity ☐ Probate

The following are facts about my financial condition. My income before taxes is:

Salary (per month): \$ <u>800.00</u>	Other Income (per month): \$ <u>0</u>
Specify source of other income, including six months of prisoners' account statements in accordance with N.J.S.A. 30:4-16.3 (per month): <u>Unemployment</u>	

The following is a complete list of everything I own and owe, as far as I know:

Own	Amount \$	Owe (per month)	Amount \$
Money in any bank accounts	<u>0</u>	Rent/mortgage	<u>850</u>
Automobiles	<u>none</u>	Food	<u>50</u>
Real estate	<u>none</u>	Utilities	<u>35</u>
Insurance with cash value	<u>none</u>	Alimony/child support	<u>0</u>
Money owed to me	<u>none</u>	Auto payment	<u>0</u>
Other (specify)	<u>none</u>	Other (specify) <u>phone</u>	<u>10</u>
TOTALS	<u>0 0</u>	TOTALS	<u>995</u>

Please attach documents as to income (pay stubs, welfare documents, unemployment documents, last bank statement, etc.)

I certify the statements made by me in this document are true and that my signed pleading is attached. I understand that if I give any false information, I may be punished by the court.

I am signing this statement to explain to the court why I am unable to pay any court fees in this lawsuit. (Rule 1:13-2(a))

Fee Waived: ☒ Yes ☐ No

Signature (Applicant): Ronald Morrison
Date: 10/22/12
(Print Name) Ronald Morrison

Signature (Judge): Michael E. Hubner
Michael E. Hubner / JSC Approved 10/22/12;
Signed 11/1/12
(Print Name) MICHAEL E. Hubner

Special Civil Part Complaint – Form A

Superior Court Of New Jersey
Law Division, Special Civil Part

Essex County

Ronald Morrison

Plaintiff's Name

8 Monticello Ave #32

Street Address

Newark NJ 07106

Town, State, Zip Code

201-281-1461

Telephone Number

Docket No. FILED Oct 26, 2012

vs.
LUVU Funding

Defendant's Name (Person you are suing)

P.O. Box 10497

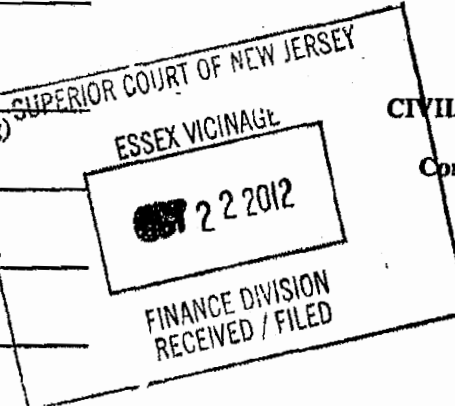
Street Address

Greenville SC, 29603

Town, State, Zip Code

888-665-0374

Telephone Number

DC-024369-12
CIVIL ACTION
Complaint

Type or print the reasons you, the Plaintiff(s), are suing the Defendant(s): (See instruction B)

Creditors report inaccurately (us court of appeals 9th circuit No. 00-15946) Nelson vs. Chase NY
Creditors re-age FCRA Section 605(c) running of the reporting period.
Collection agency fail to validate FDCPA Section 809(b) FTC opinion letter call from
Lefevre

(You may attach more sheets if you need to)

The amount you, the Plaintiff(s) are demanding from the Defendant(s) \$ 15,000 plus interest and
\$ 57.00 for the costs of suing.

At the trial Plaintiff will need:

An interpreter

☐ Yes☒ No

Indicate Language: _____

An accommodation for disability

☐ Yes☒ No

Indicate Disability: _____

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now
pending or contemplated, and that no other parties should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will
be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

Date

10/22/12

Your Signature

Ronald Morrison

Name Typed, Stamped or Printed

NOTICE OF BENEFIT DETERMINATION - EMERGENCY UNEMPLOYMENT COMPENSATION (EUC) 2008

State of New Jersey
 Department of Labor and Workforce Development
 Division of Unemployment Insurance
 EUC Processing Unit
 PO BOX 480
 Trenton, NJ 08625-0480

SSN XXX-XX-9063	PC 10	DATE OF ORIGINAL CLAIM 08-29-2010
CLAIMANT'S NAME RONALD MORRISON		
EUC TIER 3	DATE BENEFITS EXHAUSTED ON ORIGINAL CLAIM 02-26-2011	
EUC WEEKLY BENEFIT RATE \$200.00	BENEFIT YEAR ENDING DATE 08-27-2011	
DATE OF MAILING 09-24-2012		

☒

You are eligible for Emergency
 Unemployment Compensation
 (EUC) 2008 as of

09-23-2012

Maximum Benefit Amount Under EUC \$1,800.00

☐

You are not eligible for Emergency
 Unemployment Compensation (EUC) 2008
 because:

You did not have 20 base weeks of employment
 in the base year of your original claim or have
 earnings of at least 40 times your weekly benefit
 rate in your base year

WORK SEARCH RECORD REQUIREMENT

new legislation requires that all recipients of EUC benefits must document their active search for work. Individuals who are receiving EUC benefits must:

- actively seek full-time work
- make a minimum of three (3) employer contacts per week with three (3) different prospective employers
- maintain a written record of their work search contacts. The written record must contain the following:
 - > date of contact
 - > name, address, and telephone number of the employer
 - > method of contact
 - > name of person contacted
 - > position applied for
 - > whether an employment application was taken
 - > result of the contact

Recipients of EUC benefits may be required to produce a record of their work search contacts upon request by the New Jersey Department of Labor and Workforce Development. Failure to make a minimum of three (3) job contacts each week and to produce a documented work search record, when requested, may result in the denial of unemployment benefits. For our record keeping purposes, please be advised that the unemployment week runs from Sunday through Saturday. A sample Work Search Record can be found and printed by visiting the Department of Labor and Workforce Development, Unemployment Insurance website and selecting "Forms & Publications for Claimants and Employers."

APPEAL RIGHTS: A determination becomes final unless a written appeal is filed within seven calendar days after delivery or within ten calendar days after the mailing of the determination. Your appeal must be received or postmarked within one of the appeal periods. If the last day allowed for the appeal occurs on a Saturday, Sunday or legal holiday, the appeal will be accepted on the next business day. The appeal period will be extended if good cause for late filing is shown. Good cause exists in situations where it can be shown that the delay was due to circumstances beyond the control of the appellant which could not have been reasonably foreseen or prevented. To file your appeal, mail your appeal to the EUC Processing Unit address shown above. Give your reasons for disagreeing with the determination, and if late, the reason for the delay. Be certain that your name, social security number and address are clearly written on your appeal.

Confidential Unemployment Compensation Information will be used for other governmental purposes, including verifying an individual's eligibility for other governmental programs.

NOTICE: Under 18 U.S.C. § 1001, knowingly and willfully concealing a material fact by any trick, scheme, or device or knowingly making a false statement in connection with this claim is a Federal Offense, punishable by a fine of not more than \$10,000 or imprisonment for not more than five years, or both.

ESTA DETERMINACION AFECTA SU ELEGIBILIDAD PARA BENEFICIOS Y DESCRIBE SUS DERECHOS DE APELAR. SI USTED NO SABE LEER INGLES, AVISOR DE CONSEGUIRSE ALGUIEN QUIEN LE PUEDA TRADUCIR ESTA DETERMINACION INMEDIATAMENTE.

UC-13 (03-12) New Jersey Department of Labor and Workforce Development - Unemployment Insurance

UC13 (03/20/12)

**For service at**

8 MONTICELLO AVE APT 32
NEWARK CITY NJ
07106-1542

1 800 436-PSEG (7734)

Emergencies 24 hours/7 days

Customer service

7 AM - 8 PM Mon - Fri

7 AM - 5 PM Sat

Visit our website

www.pseg.com

Inquiries by mail

PSEG

PO Box 14444

New Brunswick NJ 08906-4444

Important Dates

Your payment for current charges is due October 08, 2012

Your meter(s) are scheduled to be read on or about October 18

To make a payment from a credit card Log In to **My Account** at pseg.com or call 1 800-704-3289

If you'll be away on your meter reading day, Log In to **My Account** at pseg.com or call 1 800 622-0197 before the scheduled date, to submit your reading

Monthly Statement SEPTEMBER 2012

Account number: 70 424 296 05

Invoice number: 601302088563

019830



000019830 01 AV 0.350

000000009

RONALD MORRISON
8 MONTICELLO AVE A-32
NEWARK NJ 07106

Account Summary

PSEG balance from last bill	\$114.07
Current PSEG - Gas	5.99
Current PSEG - Electric	30.62
Deposit Amount Due	38.00
Total Amount Due	\$150.68

**** SHUT-OFF NOTICE ** 1-800-357-2262 (Mon-Fri, 7:30 AM - 8:00 PM)**

Your bill is now past due. Payment of \$114.07 must be received by 10/8/2012 or service may be shut off. This includes a security deposit of \$38.00. A statement of customer rights and fees is shown on the reverse side.

Si en el futuro usted desea recibir la notificación de desconexión de servicio en español, por favor llame al 1-800-357-2262.

Start up your heating system now, before you really need to use it. By checking your heating system now, you'll find out if it's working properly, and address repairs if necessary

Analyze your home energy usage with PSEG's Home Energy Toolkit. You can find out where your energy dollars are going, compare your month-to-month energy costs and receive energy saving tips specific to your home profile, bills and weather. Log in to My Account at pseg.com and click on "Home Energy Toolkit"

7042429605 0000150681 00001140731



To help us make things work for you. Please return this portion with your payment. Make checks payable to PSEG. Do not fold checks. Do not write on, staple, paper clip or tape payment to the coupon. Be sure payment address shows through window

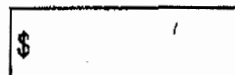
RONALD MORRISON
8 MONTICELLO AVE A-32
NEWARK NJ 07106

70 424 296 05

Total Amount Due
ATTENTION: SHUT-OFF NOTICE ABOVE

\$150.68

PSEG CO
PO BOX 14444
NEW BRUNSWICK NJ 08906-4444



Amount enclosed

TENANT SUMMONS AND RETURN OF SERVICE

Plaintiff or Plaintiff's Attorney Information:
 The Massenburg Law Group LLC
 300 Avalon Dr.
 Suite 3455
 Wood-Ridge, NJ 07075
 609.922.355

Superior Court of New Jersey
 Law Division ESSEX County
 Special Civil Part/Tenancy Dept.
 465 Martin Luther King Blvd.
 Hall of Records
 Newark, NJ 07102

Whiterock Management, LLC Plaintiff (s)

Docket No.: LT - 28441-12
 (To be provided by the court)

verses

Civil Action
 Summons
 Landlord/Tenant

Ronald Morrison Defendant(s)

Defendant Information
 Name: Ronald Morrison
 Address: 8 Monticello
 Apt #: 32
 City/State/Zip: NEWARK NJ 07106
 Phone: _____

☒ Nonpayment - Back Rent Claimed: \$ 2759
☐ Other

NOTICE TO TENANT: The purpose of this attached complaint is to permanently remove you and your belongings from the premises. If you want the court to hear your side if the case you must appear in court on this date and time: 10-15-12 at 8:30 a.m., or the court may rule against you. REPORT TO: 465 Martin Luther King Blvd., Hall of Records, Newark, New Jersey, 07102, Room 155

If you cannot afford to pay for a lawyer, free legal advice may be available by contacting Legal Services at 973.824.3000. If you can afford to pay a lawyer but do not know one, you may call the Lawyer Referral Services of your local county Bar Association at 973.622.7753.

You may be eligible for housing assistance. To determine your eligibility, you must immediately contact the Welfare Agency in your county at: 240 Harrison St, 3rd Floor, East Orange, New Jersey, 07018 telephone number 973.266.2822.

If you need an interpreter or an accommodation for a disability, you must notify the court immediately.

Si Ud. no tiene dinero para pagar a un abogado, es posible que pueda recibir consejos legales gratuitos si se comunica con Servicios Legales al 973.824.3000. Si tiene dinero para pagar a un abogado pero no conoce ninguno puede llamar a Servicios de Recomendación de Abogados del Colegio de Abogados de su condado local al 973.622.7533.

Es posible que pueda recibir asistencia con la vivienda si se comunica con la agencia de asistencia publica Welfare Agency de su condado a 240 Harrison St, 3rd Floor, East Orange, New Jersey, 07018 telefono 973.266.2822.

Si necesita un interprete o alguna acomodacion para un impedimento fisico, tiene que notificarselo inmediatamente al tribunal.

Date: _____

[Signature]
 Clerk of the Special Civil Part

COURT OFFICERS RETURN OF SERVICE (FOR COURT USE ONLY)

Docket Number: _____ Date: _____ Time: _____
 WM ___ WF ___ BM ___ Other ___ HT ___ WT ___ AGE ___ Mustache ___ Beard ___ Glasses ___

Name: _____ Relationship: _____
 Efforts Made to Personally Serve: _____
 Description of Premises: _____

I hereby certify the above to be true and accurate: _____ Court Officer

**Superior Court Of New Jersey
Law Division, Special Civil Part**

County

Plaintiff's Name

Street Address

Town, State, Zip Code

Telephone Number

Docket No.

vs.

CIVIL ACTION

Answer

Defendant's Name

Street Address

Town, State, Zip Code

Telephone Number

Check the appropriate statement or statements below which set forth why you claim you do not owe money to the plaintiff.

- ☐ (1) The good or services were not received.
☐ (2) The goods or services received were defective.
☐ (3) The bill has been paid.
☐ (4) I/We did not order the goods or services.
☐ (5) The dollar amount claimed by the plaintiff(s) is incorrect.
☐ (6) Other – Set forth any other reasons why you believe money is not owed to the plaintiff(s). (You may attach more sheets if you need to.)

☐ Trial by jury requested; an extra \$50 check or money order is enclosed.

At the trial Defendant requests:

An interpreter:

☐ Yes ☐ No

Indicate Language:

An accommodation for a disability.

☐ Yes ☐ No

Requested accommodation:

I certify the matter in controversy is not the subject of any other court action or arbitration proceeding now pending or contemplated, and that no other parties should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*.

I further certify that this answer was served on all other parties within 35 days of the date the summons and complaint were mailed to me as indicated on page 2 of the summons.

Dated:

Defendant's Signature

Defendant's Name – Type or Printed

If you believe that you have a claim against the plaintiff and wish to counter-sue, you must file a counter claim with your answer. If you believe that you have a claim against another defendant, you must file a cross-claim with your answer. For information on the procedure for filing a cross-claim or counterclaim, consult with the Customer Service staff or your attorney.

APPENDIX XI-A(1)
SUMMONS AND RETURN OF SERVICE



THE SUPERIOR COURT OF NEW JERSEY
Law Division, Special Civil Part
SUMMONS

YOU ARE BEING SUED!
IF YOU WANT THE COURT TO HEAR YOUR SIDE OF THIS LAWSUIT, YOU MUST FILE A WRITTEN ANSWER WITH THE COURT WITHIN 35 DAYS OR THE COURT MAY RULE AGAINST YOU. READ ALL OF THIS PAGE AND THE NEXT PAGE FOR DETAILS.

In the attached complaint, the person suing you (who is called *the plaintiff*) briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. You are cautioned that if you do not answer the complaint, you may lose the case automatically, and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment and the judgment is valid for 20 years.

You can do one or more of the following things:

1. *Answer the complaint.* An answer form is available at the Office of the Clerk of the Special Civil Part. The answer form shows you how to respond in writing to the claims stated in the complaint. If you decide to answer, you must send it to the court's address on page 2 and pay a \$15 filing fee with your answer and send a copy of the answer to the plaintiff's lawyer or to the plaintiff if the plaintiff does not have a lawyer. Both of these steps must be done within 35 days (including weekends) from the date you were "served" (sent the complaint). That date is noted on the next page.

AND/OR

2. *Resolve the dispute.* You may wish to contact the plaintiff's lawyer, or the plaintiff if the plaintiff does not have a lawyer, to resolve this dispute. You do not have to do this unless you want to. This may avoid the entry of a judgment and the plaintiff may agree to accept payment arrangements, which is something that cannot be forced by the court. Negotiating with the plaintiff or the plaintiff's attorney will not stop the 35-day period for filing an answer unless a written agreement is reached and filed with the court.

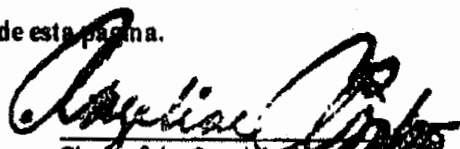
AND/OR

3. *Get a lawyer.* If you cannot afford to pay for a lawyer, free legal advice may be available by contacting Legal Services at 973-622-4500. If you can afford to pay a lawyer but do not know one, you may call the Lawyer Referral Services of your local county Bar Association at 973-622-6204.

If you need an interpreter or an accommodation for a disability, you must notify the court immediately.

La traducción al español se encuentra al dorso de esta página.

Effective 9/2002


Clerk of the Special Civil Part



EL TRIBUNAL SUPERIOR DE NUEVA JERSEY
División de Derecho, Parte Civil Especial
NOTIFICACIÓN DE DEMANDA

¡LE ESTÁN HACIENDO JUICIO!
SI UD. QUIERE QUE EL TRIBUNAL VEA SU VERSIÓN DE ESTA CAUSA, TIENE QUE PRESENTAR UNA CONTESTACIÓN ESCRITA EN EL TRIBUNAL DENTRO DE UN PERÍODO DE 35 DÍAS O ES POSIBLE QUE EL TRIBUNAL DICTAMINE EN SU CONTRA. PARA LOS DETALLES, LEA TODA ESTA PÁGINA Y LA QUE SIGUE.

En la demanda adjunta, la persona que le está haciendo juicio (que se llama *el demandante*) da al juez su versión breve de los hechos del caso y la suma de dinero que alega que Ud. le debe. Se le advierte que si Ud. no contesta la demanda, es posible que pierda la causa automáticamente y que el tribunal dé al demandante lo que pide más intereses y costas. Si se registra una decisión en su contra, es posible que un Oficial de la Parte Civil Especial (Special Civil Part Officer) embargue su dinero, salario o bienes muebles para pagar toda o parte de la adjudicación, y la adjudicación tiene 20 años de vigencia.

Usted puede escoger entre las siguientes opciones:

1. *Contestar la demanda.* Puede conseguir un formulario de contestación en la Oficina del Secretario de la Parte Civil Especial. El formulario de contestación le indica cómo responder por escrito a las alegaciones expuestas en la demanda. Si Ud. decide contestar, tiene que enviar su contestación a la dirección del tribunal que figura en la página 2, pagar un gasto de iniciación de la demanda de \$15 dólares y enviar una copia de la contestación al abogado del demandante, o al demandante si el demandante no tiene abogado. Tiene 35 días (que incluyen fines de semana) para hacer los trámites a partir de la fecha en que fue "notificado" (le enviaron la demanda). Esa fecha se anota en la página que sigue.

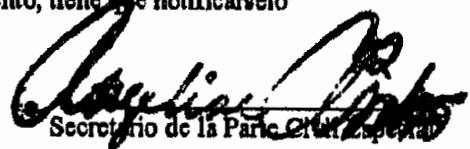
ADEMÁS, O DE LO CONTRARIO, UD. PUEDE

2. *Resolver la disputa.* Posiblemente Ud. quiera comunicarse con el abogado del demandante, o el demandante si el demandante no tiene abogado, para resolver esta disputa. No tiene que hacerlo si no quiere. Esto puede evitar que se registre una adjudicación y puede ser que el demandante esté de acuerdo con aceptar un convenio de pago lo cual es algo que el juez no puede imponer. Negociaciones con el demandante o el abogado del demandante no suspenderán el término de 35 días para registrar una contestación a menos que se llegue a un acuerdo escrito que se registra en el tribunal.

ADEMÁS, O DE LO CONTRARIO, UD. PUEDE

3. *Conseguir un abogado.* Si Ud. no tiene dinero para pagar a un abogado, es posible que pueda recibir consejos legales gratuitos comunicándose con Servicios Legales (Legal Services) al 973-622-4500. Si tiene dinero para pagar a un abogado pero no conoce ninguno puede llamar a Servicios de Recomendación de Abogados (Lawyer Referral Services) del Colegio de Abogados (Bar Association) de su condado local al 973-622-6204.

Si necesita un intérprete o alguna acomodación para un impedimento, tiene que notificárselo inmediatamente al tribunal.


Secretario de la Parte Civil Especial

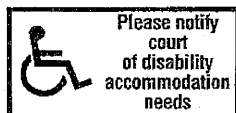
CERTIFIED MAIL



7136 0708 2830 6521 9367

OFFICE OF SPECIAL CIVIL PART CLERK
ESSEX COUNTY COURTHOUSE
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102-1782

ESX



Summons
CP.

RECEIVED

NOV 13 2012

ESX-DC-024369-12

LVNV

P.O. BOX 10497

GREENVILLE

SC 29603

EXHIBIT “B”

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.
200 Route 31 North, Suite 203
Flemington, NJ 08822
Phone (908) 751-5940
Fax (908) 751-5944
Attorneys for Defendant
LVNV Funding, LLC

RONALD MORRISON,
Plaintiff,

Y.

LVNV FUNDING, LLC,
Defendant.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – SPECIAL CIVIL PART,
ESSEX COUNTY**

DC-024369-12

**NOTICE OF FILING OF
NOTICE OF REMOVAL TO THE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TO: Clerk of the Court
Civil Customer Service
Hall of Records
Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

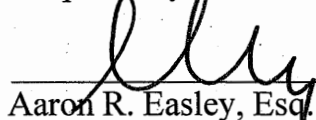
Ronald Morrison
8 Monticello Avenue, Apt. #32
Newark, NJ 07106-1524
Tel. No. : 201-281-1461
Plaintiff Pro Se

PLEASE TAKE NOTICE that this action has been removed to the United States District Court for the District of New Jersey. Attached hereto as Exhibit "1" is a copy of the Notice of Removal filed in the United States District Court effecting such removal.

PLEASE TAKE FURTHER NOTICE that in accordance with 28 U.S.C. § 1446(d), the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County, shall proceed no further in this action unless and until the action is remanded by the United States District Court for the District of New Jersey.

Dated: December 11, 2012

Respectfully submitted



Aaron R. Easley, Esq.
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.
200 Route 31 North, Suite 203
Flemington, NJ 08822
Phone: (908) 751-5940
Fax: (908) 751-5944
aeasley@sessions-law.biz
Attorney for Defendant
LVNV Funding, LLC

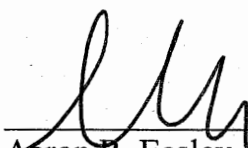
CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December 2012, a copy of the foregoing **Notice of Filing of Notice of Removal to the United States District Court for the District of New Jersey** was served by Federal Express upon the Clerk of the Court and via regular mail upon Plaintiff at the below address:

Clerk of the Court
Civil Customer Service
Hall of Records
Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

Ronald Morrison
8 Monticello Avenue, Apt. #32
Newark, NJ 07106-1524
Tel. No. : 201-281-1461
Plaintiff Pro Se

By:



Aaron R. Easley, Esq.
Attorney for Defendant
LVNV Funding, LLC